# UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

Timothy Jackson, *Plaintiff*,

v.

Laura Wright, Milton B. Lee, Melisa Denis, Mary Denny, Daniel Feehan, A.K. Mago, Carlos Munguia, and G. Brint Ryan, each in their official capacities as members of the Board of Regents for the University of North Texas System; Rachel Gain; Ellen Bakulina; Andrew Chung; Diego Cubero; Steven Friedson; Rebecca Dowd Geoffroy-Schwinden; Benjamin Graf; Frank Heidlberger; Bernardo Illari; Justin Lavacek; Peter Mondelli; Margaret Notley; April L. Prince; Cathy Ragland; Gillian Robertson; Hendrik Schulze; Vivek Virani; and Brian F. Wright, Defendants.

Case No. 4:21-cv-00033-ALM

## JOINT NOTICE OF SETTLEMENT

TO THE HONORABLE U.S. DISTRICT JUDGE AMOS L. MAZZANT:

Plaintiff, Timothy Jackson, and Defendants, Laura Wright, Milton B. Lee, Melisa Denis, Mary Denny, Daniel Feehan, A.K. Mago, Carlos Munguia, and G. Brint Ryan, each in their official capacities as members of the Board of Regents for the University of North Texas System, and Rachel Gain, Ellen Bakulina, Andrew Chung, Diego Cubero, Steven Friedson, Rebecca Down Geoffroy-Schwinden, Benjamin Graf, Frank Heidlberger, Bernardo Illari, Justin Lavacek, Peter Mondelli, Margaret Notley, April L. Prince, Cathy Ragland, Gillian Robertson, Hendrik Schulze,

Vivek Virani, and Brian Wright, each in their individual capacities, (collectively, "the Parties") file this Joint Notice of Settlement and hereby notify the Court that this case has settled in principle. The agreement is receiving the necessary approvals required by law. The Parties respectfully request that all current settings be stayed until April 9, 2025, so that appropriate dismissal documents may be submitted. The Plaintiff, Timothy Jackson, will file a Notice of Dismissal with Prejudice once the agreement is executed.

Respectfully submitted.

/s/ Michael Thad Allen

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#### **KIMBERLY GDULA**

Chief, General Litigation Division

# /s/ William H. Farrell

## WILLIAM H. FARRELL

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## **COUNSEL FOR DEFENDANTS**

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2025, a true and correct copy of the foregoing Joint Notice of Settlement was served on all counsel of record via e-mail.

> /s/ William H. Farrell
> WILLIAM H. FARRELL **Assistant Attorney General**